

Grayer & Dilday, LLP

COUNSELLORS-AT-LAW
27 SCHOOL STREET - SUITE 400
BOSTON, MASSACHUSETTS 02108
TEL. (617) 227-3470 • FAX (617) 227-9231

July 11, 2005

Michael J. Akerson, Esq.
John K. Vigliotti, Esq.
Readon, Joyce & Akerson, P.C.
397 Grove Street
Worcester, MA 01605

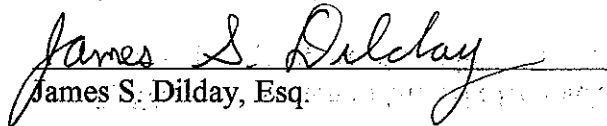
Re: Terri Pechner-James et al v City of Revere et al #03-12499MLW

Dear Attorney Vigliotti,

The purpose of this letter is to respond to your request of July 11, 2005.

- (1) The emergency room records to which you referred in you telephone call were provided to you in response to you Request for Production of Documents. The emergency room reports were from Massachusetts General Hospital. They cover the period from August 1997 to July 2001.
- (2) We have written to Dr. Erik Keroack, M.D. and requested his notes and emergency reports on which he relied in the preparation of his opinion letter.
- (3) We have provided you with all of the Plaintiff's tax returns up to and including the year 2000. Her last day of work was March 16, 2001. I am enclosing a compensation statement from the City of Revere that provides a weekly breakdown of her regular compensation from May 3, 2000 to May 2, 2001. This statement is comprehensive; it includes compensation for 2001.
- (4) We are also requesting from Dr. Susan Rudman, Psychologist, the notes of her treatment of the Plaintiff.
- (5) Dr. Dominiak was a member of the medical panel that assessed the Plaintiff's Post-Traumatic Stress Disorder and diagnosed her as disabled and eligible for retirement benefits. We do not have access to their notes. They were not her treating physicians. We will forward the requested information to you as soon as we receive it. Please call if you have any questions.

Sincerely,


James S. Dilday, Esq.